

Comparing Three Medi-Cal Benefits: Community Health Workers, Doulas, and Peer Support Specialists

This document provides a side-by-side comparison of three Medi-Cal benefits that became effective in July 2022 and January 2023: community health worker (CHW), doula, and peer support specialist (PSS) services. CHWs are sometimes collectively referred to as CHW/P/Rs to include *promotores* and community health representatives (CHRs), who primarily serve Spanish-speaking and American Indian / Alaska Native communities, respectively. The benefits listed do not encompass all the types of work CHW/P/Rs, doulas, and peer support specialists do nor the full range of services they can provide. For example, they

may provide services through other county-based or Medi-Cal benefits or programs using different billing codes with different requirements. These workforces also serve non-Medi-Cal members, including those who are privately insured or uninsured.

This document does not include dental and enhanced CHW services through CalAIM (California Advancing and Innovating Medi-Cal) or the Behavioral Health Community-Based Organized Networks of Equitable Care and Treatment (BH-CONNECT) Medicaid Section 1115 demonstration waiver.

WORKFORCE	CHW/P/RS	DOULAS	PEER SUPPORT SPECIALISTS
Benefit authority	SPA 22-0001 (PDF)	SPA 22-0002 (PDF)	SPA 20-0006-A (PDF) SPA 21-0058 (PDF) SPA 21-0051 (PDF)
Effective date	July 1, 2022	January 1, 2023	July 1, 2022
Benefit type	Preventive services pursuant to 42 CFR § 440.130(c)	<ul style="list-style-type: none"> ▶ Preventive services pursuant to 42 CFR § 440.130(c), and ▶ Professional services under the freestanding birth center benefit 	<ul style="list-style-type: none"> ▶ Optional behavioral health (BH) benefit administered by county BH agencies through Drug Medi-Cal / Drug Medi-Cal Organized Delivery System (DMC/DMC-ODS) or specialty mental health services (SMHS). ▶ To date, 50 counties have opted in for one or both delivery systems. ▶ All counties must provide medically necessary PSS services to enrollees under 21 as part of the EPSDT benefit.

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Provider definition	CHWs are trusted members of their community who help address chronic conditions, preventive health care needs, and health-related social needs. CHWs may include <i>promotores</i> , CHRs, navigators, and other nonlicensed public health workers, including violence prevention professionals (VPPs).	Doulas are birth workers who provide health education, advocacy, and physical, emotional, and nonmedical support for pregnant and postpartum people before, during, and after childbirth, including miscarriage, stillbirth, and abortion. Doulas are not licensed or clinical providers, and they do not require supervision.	PSSs are people with a current state-approved Medi-Cal Peer Support Specialist certification who meet all other applicable California requirements, including for ongoing education. PSSs provide services under the direction of a BH professional. (Definition includes lived experience, see below.)
Services definition	<p>CHW services:</p> <ul style="list-style-type: none"> ▶ Are preventive health services, as defined in 42 CFR 440.130(c), to prevent disease, disability, and other health conditions or their progression; to prolong life; and to promote physical and mental health ▶ Include health education, health navigation, screening and assessment, and individual support or advocacy ▶ May help with a variety of concerns, including the control and prevention of chronic conditions or infectious diseases, BH conditions, and need for preventive services ▶ Can help members receive appropriate services related to perinatal care, preventive care, sexual and reproductive health, environmental and climate-sensitive health issues, oral health, aging, injury, and domestic violence and other violence prevention services ▶ May include street medicine, within their scope of practice ▶ May be provided in an individual or group setting ▶ May be provided to a parent or legal guardian of a member under age 21 for their direct benefit in accordance with a recommendation from a licensed provider 	<p>Doula services:</p> <ul style="list-style-type: none"> ▶ Encompass the health education, advocacy, and physical, emotional, and nonmedical support provided before, during, and after childbirth or end of a pregnancy, including throughout the postpartum period ▶ Are aimed at preventing perinatal complications and improving health outcomes for birthing parents and infants ▶ Include various types of support, including perinatal, labor, and miscarriage support and guidance; health navigation; evidence-based education for prenatal, postpartum, childbirth, and newborn and infant care; lactation support; development of a birth plan; and linkages to community-based resources 	<p>PSS services:</p> <ul style="list-style-type: none"> ▶ Are culturally competent individual and group services that promote recovery, resiliency, engagement, socialization, self-sufficiency, self-advocacy, development of natural supports, and identification of strengths through structured activities such as group and individual coaching to set recovery goals and identify steps to reach the goals ▶ Aim to prevent relapse, empower enrollees through strength-based coaching, support linkages to community resources, and educate enrollees and their families about their conditions and the process of recovery ▶ Included services: <ul style="list-style-type: none"> ▶ Educational skill-building groups ▶ Engagement ▶ Therapeutic activity ▶ May be provided with the enrollee or significant support person(s) ▶ May be provided in a clinical or nonclinical setting ▶ Can include contact with family members and others if the purpose is to focus on the treatment needs of the enrollee by supporting their achievement of treatment goals ▶ Are based on an approved plan of care that includes specific individualized goals ▶ Can be delivered as a stand-alone service

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Provider minimum qualifications	No minimum age or education requirement under Medi-Cal	<ul style="list-style-type: none"> ▶ 18 years old ▶ Infant and adult CPR certification ▶ HIPAA training 	<ul style="list-style-type: none"> ▶ 18 years old ▶ HS diploma or GED ▶ Dedication to recovery ▶ Must adhere to code of ethics
Lived experience requirement	<ul style="list-style-type: none"> ▶ Yes, that aligns with and provides a connection between the CHW and the member or population being served ▶ May include experience related to incarceration, military service, pregnancy and birth, disability, foster system placement, homelessness, mental health / substance use disorder (MH/SUD), or being a survivor of domestic or intimate partner violence or abuse and exploitation ▶ May also include (1) shared race, ethnicity, sexual orientation, gender identity, language, or cultural background with one or more linguistic, cultural, or other groups in the community for which the CHW is providing services or (2) familiarity with or experience in the geographic communities they serve 	No specific requirement under Medi-Cal, though many do have lived experience	<ul style="list-style-type: none"> ▶ Yes, self-identified as having experience with the process of recovery from an MH/SUD condition, either as a user of these services or as their parent, caregiver, or family member ▶ Must disclose and be willing to share their experience to provide hope and inspiration for recovery
Certificate pathway	<ul style="list-style-type: none"> ▶ Yes, and allows CHW to provide all CHW services including VPP services ▶ Certificate attesting to demonstrated skills or practical training on required topics (communication, interpersonal and relationship building, service coordination and navigation, capacity building, advocacy, education and facilitation, individual and community assessment, professional skills and conduct, outreach, evaluation and research, and basic knowledge in public health principles and social drivers of health), as determined by the supervising provider ▶ Field experience requirement <p>For VPP-only providers. VPP certificate from The Health Alliance for Violence Intervention or certificate of completion in gang intervention training from Urban Peace Institute</p> <p>For unlicensed asthma preventive services providers. Certificate from the California Department of Public Health Asthma Management Academy or another training program + 16 hours' face-to-face client contact + 4 hours' continuing education (CE) annually</p>	<ul style="list-style-type: none"> ▶ Certificate of completion of 16 hours of training on required topics (lactation support, childbirth education, foundations on anatomy of pregnancy and childbirth, nonmedical comfort measures, prenatal support and labor support techniques, and developing a community resource list) ▶ Doula support provided at 3 births 	<ul style="list-style-type: none"> ▶ 80 hours of training through a CalMHSA-approved vendor ▶ Passing of certification exam and recertification every 2 years ▶ Optional specializations available: <ul style="list-style-type: none"> ▶ Parent / caregiver / family member ▶ Crisis care ▶ Unhoused ▶ Justice involved ▶ Out-of-state reciprocity pathway + California certification exam (required for out-of-state PSSs)

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Experience pathway	Limited (<i>allowed only for first 18 months, then certificate required</i>) — 2,000+ hours working as paid or volunteer CHW in previous 3 years	Yes — 5 years' active doula experience in past 7 years + 3 client testimonials or professional letters of recommendation	No — initially allowed through a legacy provision, which expired June 30, 2023
CE requirement	6 hours per year	3 hours every 3 years	20 hours and must recertify every 2 years
Medi-Cal provider enrollment pathway	Supervising providers must enroll as Medi-Cal providers if there is a state-level pathway; not required for individual CHWs.	Must enroll through PAVE as individuals, group providers, rendering providers, or ordering/referencing /prescribing providers.	Not required as long as the organizational provider that they are employed by or contracted with meets applicable PIMS or SMART6i enrollment requirements.
Credentialing/recredentialing requirements	Required for supervising providers with state-level enrollment pathway; not required for CHWs	Required	Required for organizing provider employing or contracting with PSSs
Supervision requirement	<p>CHWs must be supervised by a Medi-Cal-enrolled community-based organization, local health jurisdiction, licensed provider, hospital, or clinic, as defined in 42 CFR 440.90.</p> <p>Supervising providers:</p> <ul style="list-style-type: none"> ▶ Hold the contract with the Medi-Cal Managed Care Plan (MCP) ▶ Employ, manage, or <i>directly or indirectly</i> oversee CHWs ▶ Are responsible for ensuring CHW compliance ▶ Must maintain evidence of CHW qualifications/training and lived experience 	Not applicable: Doulas are not licensed or clinical providers, and they do not require supervision.	<ul style="list-style-type: none"> ▶ Must provide services under the direction of a BH professional (someone licensed, waived, or registered in accordance with applicable California licensure requirements and listed in the California Medicaid State Plan as a qualified provider of SMHS, DMC, or DMC-ODS). ▶ May be supervised by a PSS supervisor who meets applicable California state requirements.
Recommendation for services from physician or licensed practitioner of the healing arts requirement	<ul style="list-style-type: none"> ▶ Yes, but does not have to be supervising provider and does not have to be a Medi-Cal-enrolled provider ▶ Written recommendation from physician, licensed practitioner of the healing arts, physician assistant, nurse practitioner, clinical nurse specialist, podiatrist, nurse midwife, licensed midwife, registered nurse, public health nurse, psychologist, licensed marriage and family therapist, or licensed clinical social worker ▶ Or MCP may issue standing recommendation ▶ Must be submitted to MCP 	<ul style="list-style-type: none"> ▶ Yes, and DHCS issued standing recommendation for initial set of services (see below) ▶ Written recommendation required for additional postpartum visits 	<ul style="list-style-type: none"> ▶ Yes, from licensed practitioner of the healing arts, licensed mental health professional, or BH professional ▶ Requires approved plan of care that includes specific individualized goals

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Benefit eligibility	<ul style="list-style-type: none"> ▶ Enrolled in Medi-Cal or is the parent or legal guardian of an eligible child under age 21 if services are provided for their direct benefit (member must be present if parent or guardian is not enrolled in Medi-Cal) ▶ Must have diagnosis or suspected presence of specified conditions; indicators of risk; adverse childhood event–related life event; known risk factors; unmet health-related social needs based on social drivers of health screening; recent ED visit, inpatient stay, or detox stay; recent missed medical appointments; member request; or need for preventive services ▶ VPP services. Recent violent injury due to, at risk for, or chronic exposure to community violence 	<ul style="list-style-type: none"> ▶ Enrolled in Medi-Cal ▶ Pregnant, or pregnant within past year ▶ Would either benefit from or requests doula services 	<ul style="list-style-type: none"> ▶ Enrolled in Medi-Cal and receiving services through a certified DMC/DMC-ODS or SMHS program (opt-in counties) or through EPSDT benefit (all counties) ▶ Parent or legal guardian of an eligible child age 17 and under if services provided for their direct benefit
Covered services	<ul style="list-style-type: none"> ▶ Up to 12 units (30 mins. each) without prior authorization, then must have a written care plan from a licensed provider (valid for up to a year) ▶ MCPs may impose Quantity Limits based on care plan goals 	<ul style="list-style-type: none"> ▶ One initial 90-minute visit ▶ Up to 8 additional pre/postnatal visits ▶ Support during labor and delivery (including miscarriage, stillbirth, abortion) ▶ Up to 2 extended 3-hour postpartum visits 	In accordance with approved care plan
Limitations	<ul style="list-style-type: none"> ▶ Maximum of four 30-minute units per enrollee per day, any provider ▶ Additional units per day require approved treatment authorization request for medical necessity ▶ Treatment authorization request may be submitted after service is provided 	Up to 9 additional postpartum visits (<i>recommendation required</i>)	Maximum of 96 units (15 mins. each) for each billing code below

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Billing codes and fee schedule (contracted rates with county BH agencies and mental health plans may vary)	Education and training for patient self-management by a qualified, nonphysician health care professional using a standardized curriculum, face-to-face with the patient (could include caregiver or family member)		Z1032 — Extended initial visit, 90 minutes	\$197.98	Effective July 1, 2024, per 15 minutes:	Varies by county (ranges provided)
	As of November 2024, per 30 minutes:		Z1034 — (prenatal) or Z1038 (postpartum) visit	\$162.11 (up to 8)		
			T1032 — Extended postpartum visit	\$486.36 (up to 2)		
			59409 — Support during vaginal delivery	\$685.07		
	98960 (individual)	\$26.66	59612 — Support during VBAC	\$768.69	H0025 — BH prevention education service, peer support group session	\$13.31–\$25.45
	98961 (2–4 patients)	\$12.66	59620 — Support during caesarean section	\$795.73		
	98962 (5–8 patients)	\$9.46	Support during or after: T1033 — miscarriage 59840 — abortion	\$250.85	H0038 — Self-help/peer services, individual	\$59.89–\$114.54
					H0050 — Alcohol and/or drug services, brief intervention	\$56.68–\$114.54
Telehealth	Permitted in accordance with Medi-Cal provider manual except for in-home environmental trigger assessments for asthma		Permitted in accordance with Medi-Cal provider manual		Permitted	
Place of service restrictions	None		None		None	

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About the Author

Sunshine Moore is an independent health policy consultant focusing on strategy and business development. She works with community-based organizations, government agencies, managed care plans, and public and private health care organizations to develop strategic plans, navigate complex health policies and regulations, and implement new programs and services.

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